NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau D
625 Broadway, 12th Floor, Albany, NY 12233-7013
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www.dec.ny.gov

August 9, 2018

Mr. Edward J. Hannon
Northrop Grumman Corporation Aerospace Systems
925 South Oyster Bay Rd.
M/S X01-14
Bethpage, NY 11714-3582

Re: SPDES Permit Equivalent Application, OU2 and OU3 On-Site Containment Systems, Northrop Grumman Bethpage Facility Site, Bethpage. NYSDEC Site No 130003A

Ed:

As a follow-up to the Operable Unit 2 and Operable Unit 3 On-Site Containment Systems (ONCT) discharge limits outlined in the New York State Department Environmental Conservation (NYSDEC) October 12, 2017 letter to Northrop Grumman, the NYSDEC has provided responses to your questions related to iron and pH measurements of the ONCT discharge water. The NYSDEC Division of Water responses to the presence of iron and the pH of discharge water, along with the updated discharge limits, are detailed in the attached memorandum dated July 30, 2018.

Thanks, and please do not hesitate to contact me at (518) 402-9478 or jason.pelton@dec.ny.gov with any questions.

Sincerely,

Jason Pelton

Digitally signed by Jason Pelton
DN: cn=Jason Pelton, o=NYSDEC, ou=Division of Environmental Remediation, email=jason.pelton@dec.ny.gov, c=US
Date: 2018.08.09 07:59:12 -04'00'

Jason M. Pelton
Project Manager
Remedial Section B, Remedial Bureau D
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NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Water, Bureau of Permits
625 Broadway, Albany, New York 12233-3505
P: (518) 402-8111 | F: (518) 402-9029
www.dec.ny.gov

MEMORANDUM

TO: Jason Pelton, DER
FROM: Robert Wither, Chief, South Permits Section, DOW
SUBJECT: Northrop Grumman, Site # 1-30-003A
DATE: July 30, 2018

DOW received an e-mail from Ed Hannon, Manager ESHM for the Northrop Grumman Bethpage Facility Site regarding the SPDES Permit Equivalent for this site. He raised a question regarding the presence of iron in the discharge and the low background pH impacting pH compliance. Responses to the questions are below.

1. Iron was not included in the SPDES Permit Equivalent because the permit did not include iron monitoring or limits. Because iron was not in the permit, we do not have any monitoring data. If you have monitoring data showing its presence in the groundwater, we can include an iron, total limit.
2. After reviewing the pH results reporting in their monthly DMRs, the minimum pH was lowered to 5.0. This is equivalent to the lowest reported effluent pH since January 2012.

If you have any questions, please call me at me at 518-402-8123.

Attachment (Effluent Limitations and Monitoring Requirements)

cc: Cathy Haas, RWE, Region 1

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning **September 1, 2017** and lasting until **August 31, 2027** the discharges from the wastewater treatment facility to groundwater, Class GA shall be limited and monitored by the operator as specified below:

Outfall Number and Parameter	Discharge Limitations		Units	Minimum Monitoring Requirements	
	Monthly Avg.	Daily Max		Measurement Frequency	Sample Type
OU-2 Groundwater Remedy Tower 96 Treatment System - Treated Air Stripper Discharge to West Recharge Basins:					
Flow	Monitor	Monitor	GPD	Continuous	Recorder
pH (range)	5.0 – 8.5		SU	Monthly	Grab
Total Nitrogen (as N)	Monitor	10	mg/l	Monthly	Grab
Iron, Total	Monitor	600	µg/l	Monthly	Grab
Manganese, Total	Monitor	600	µg/l	Monthly	Grab
Sum of Iron, Total and Manganese, Total	Monitor	1000	µg/l	Monthly	Calculated
1.1-Dichloroethylene	Monitor	5	µg/l	Monthly	Grab
Methylene Chloride	Monitor	5	µg/l	Monthly	Grab
Tetrachloroethylene	Monitor	5	µg/l	Monthly	Grab
1,1,1-Trichloroethane	Monitor	5	µg/l	Monthly	Grab
Trichloroethylene	Monitor	5	µg/l	Monthly	Grab
Vinyl chloride	Monitor	5	µg/l	Monthly	Grab
1,2-(trans)-Dichloroethylene	Monitor	5	µg/l	Monthly	Grab
1,2-(cis)-Dichloroethylene	Monitor	5	µg/l	Monthly	Grab
Chloroform	Monitor	5	µg/l	Monthly	Grab
Trichlorofluoroethane (Freon 113)	Monitor	5	µg/l	Monthly	Grab
1,4 Dioxane	Monitor	Monitor	µg/l	Monthly	Grab

Outfall Number and Parameter	Discharge Limitations		Units	Minimum Monitoring Requirements	
	Monthly Avg.	Daily Max		Measurement Frequency	Sample Type
OU-2 Groundwater Remedy Tower 102 Treatment System - Treated Air Stripper Discharge to South Recharge Basins:					
Flow	Monitor	Monitor	GPD	Continuous	Recorder
pH (range)	5.0 – 8.5		SU	Monthly	Grab
Total Nitrogen (as N)	Monitor	10	mg/l	Monthly	Grab
Iron, Total	Monitor	600	µg/l	Monthly	Grab
Manganese, Total	Monitor	600	µg/l	Monthly	Grab
Sum of Iron, Total and Manganese, Total	Monitor	1000	µg/l	Monthly	Calculated
1.1-Dichloroethylene	Monitor	5	µg/l	Monthly	Grab
Methylene Chloride	Monitor	5	µg/l	Monthly	Grab
Tetrachloroethylene	Monitor	5	µg/l	Monthly	Grab
1,1,1-Trichloroethane	Monitor	5	µg/l	Monthly	Grab
Trichloroethylene	Monitor	5	µg/l	Monthly	Grab
Vinyl chloride	Monitor	5	µg/l	Monthly	Grab
1,2-(trans)-Dichloroethylene	Monitor	5	µg/l	Monthly	Grab
1,2-(cis)-Dichloroethylene	Monitor	5	µg/l	Monthly	Grab
Chloroform	Monitor	5	µg/l	Monthly	Grab
Trichlorofluoroethane (Freon 113)	Monitor	5	µg/l	Monthly	Grab
1,4 Dioxane	Monitor	Monitor	µg/l	Monthly	Grab

Outfall Number and Parameter	Discharge Limitations		Units	Minimum Monitoring Requirements	
	Monthly Avg.	Daily Max		Measurement Frequency	Sample Type
OU-3 Groundwater Remedy Treatment System - Treated Air Stripper and Soil Gas Containment Condensate Discharge to Nassau County Recharge Basins:					
Flow	Monitor	Monitor	GPD	Continuous	Recorder
pH (range)	5.0 – 8.5		SU	Monthly	Grab
Total Nitrogen (as N)	Monitor	10	mg/l	Monthly	Grab
Iron, Total	Monitor	600	µg/l	Monthly	Grab
Manganese, Total	Monitor	600	µg/l	Monthly	Grab
Sum of Iron, Total and Manganese, Total	Monitor	1000	µg/l	Monthly	Calculated
1.1-Dichloroethylene	Monitor	5	µg/l	Monthly	Grab
Methylene Chloride	Monitor	5	µg/l	Monthly	Grab
Tetrachloroethylene	Monitor	5	µg/l	Monthly	Grab
1,1,1-Trichloroethane	Monitor	5	µg/l	Monthly	Grab
Trichloroethylene	Monitor	5	µg/l	Monthly	Grab
Vinyl chloride	Monitor	5	µg/l	Monthly	Grab
1,2-(trans)-Dichloroethylene	Monitor	5	µg/l	Monthly	Grab
1,2-(cis)-Dichloroethylene	Monitor	5	µg/l	Monthly	Grab
Chloroform	Monitor	5	µg/l	Monthly	Grab
Trichlorofluoroethane (Freon 113)	Monitor	5	µg/l	Monthly	Grab
1,4 Dioxane	Monitor	Monitor	µg/l	Monthly	Grab

Additional Conditions:

1. The discharge rate may not exceed the effective or design treatment system capacity. All monitoring data, engineering submissions and modification requests must be submitted to:

   Jason Pelton
   Division of Environmental Remediation
   NYSDEC
   625 Broadway
   Albany, New York 12233- 7015
   518-402-9870

   With a copy sent to:

   Regional Water Engineer, Region 1
   NYSDEC
   SUNY @ Stony Brook
   50 Circle Road
   Stony Brook, NY 11790-3409

2. Only site generated wastewater is authorized for treatment and discharge.

3. Authorization to discharge is valid only for the period noted above but may be renewed if appropriate. A request for renewal must be received 6 months prior to the expiration date to allow for a review of monitoring data and reassessment of monitoring requirements.

4. Both concentration (mg/l or µg/l) and mass loadings (lbs/day) must be reported to the Department for all parameters except flow and pH.

5. Any use of corrosion/scale inhibitors, biocidal-type compounds, or other water treatment chemicals used in the treatment process must be approved by the department prior to use.

6. This discharge and administration of this discharge must comply with the substantive requirements of 6NYCRR Part 750.